

**ORIGINAL**

58217027-2741  
305 787-2741

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF TEXAS**

**FORT WORTH DIVISION**

**4 - 2 5 C V - 0 4 7 - 2 0**

**JAWWAAD ABDUR-RAHIM MUHAMMAD MINISTRY TRUST,**

**Jawwaad Abdur-Rahim Muhammad, Trustee,**

Plaintiff,

v.

**PINERIDGE APARTMENTS LLC,**

**KORCHA REALTY INVESTMENTS LLC,**

Defendants.

Case No. \_\_\_\_\_

**CIVIL COMPLAINT**

**JURY TRIAL DEMANDED**

## COMPLAINT

### THE PARTIES

1. **Plaintiff, JAWWAAD ABDUR-RAHIM MUHAMMAD MINISTRY TRUST**, is a trust that holds intellectual property rights and conducts business. Plaintiff's principal place of business is at **115 E. Main St., Suite 1025, Grand Prairie, TEXAS [75050]**. **Jawwaad Abdur-Rahim Muhammad** is the Trustee and current Minister for the trust, residing at **3765 Jason Dr., Apt 4324, Arlington, Texas [76016]**.
2. **Defendant, PINERIDGE APARTMENTS LLC**, is a Texas limited liability company that operates an apartment rental business at **3740 Little Road, Arlington, Texas 76016**.
3. **Defendant, KORCHA REALTY INVESTMENTS LLC**, is a Texas limited liability company with a place of business at **1201 Pecan Square Dr., Arlington, Texas 76012**, and acts as the property manager for **PINERIDGE APARTMENTS LLC**.

### JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction pursuant to **28 U.S.C. § 1332**, as the matter in controversy exceeds \$75,000, exclusive of interest and costs, and complete diversity exists between the parties.
5. Venue is proper in this District under **28 U.S.C. § 1391(b)** because Defendant resides in this District and a substantial part of the events giving rise to the claims occurred here.

## FACTUAL BACKGROUND

**6. Plaintiff's Intellectual Property Ownership:**

Plaintiff, **JAWWAAD ABDUR-RAHIM MUHAMMAD MINISTRY TRUST**, is the lawful owner of the copyrights to the intellectual property, including but not limited to the trade names **JAWWAAD ABDUR-RAHIM MUHAMMAD©**, **JAWWAAD MUHAMMAD©**, and **JAWWAAD A MUHAMMAD©**, which are used in commercial documents and business transactions.

**7. Defendant's Business Activity:**

Defendant, **PINERIDGE APARTMENTS LLC**, operates a business that rents apartments in Arlington, Texas.

**8. Application from Plaintiff to Defendant:**

In the second half of October 2024, **PINERIDGE APARTMENTS LLC** received an application from Plaintiff, **Jawwaad Abdur-Rahim Muhammad, Trustee**, intended for the rental of an apartment at **PINERIDGE APARTMENTS LLC**. The application was submitted as a standard commercial document.

**9. Defendant's Misuse of Plaintiff's Trade Names:**

However, **PINERIDGE APARTMENTS LLC** treated the application as a **debt note** (such as an **Asset-Backed Security (ABS)** or **Mortgage-Backed Security (MBS)**), drafted on commercial paper. The commercial paper included Plaintiff's intellectual property, including its trade names, without Plaintiff's written consent.

**10. Copyright and Security Agreement Restrictions:**

Plaintiff holds exclusive rights under **copyright law** for all commercial documents, including applications and business transactions bearing its trade names. Plaintiff's **copyright** and **security agreement** explicitly restrict the usage of its names in any

commercial documents, including debt notes, bonds, and any other instruments unless written consent is obtained from Plaintiff.

**11. Defendant's Violation of Security Agreement:**

Defendant's use of Plaintiff's trade names in the debt note and securitization process constitutes a violation of Plaintiff's intellectual property rights. Additionally, Defendant's actions directly violate the **security agreement** between the parties, which governs the securitization and transfer of any documents bearing Plaintiff's intellectual property.

**12. Defendant's Failure to Respond to Correspondence:**

After Plaintiff discovered the unauthorized use of its trade names and the securitization of the debt note, Plaintiff sent multiple correspondences to Defendant, including a **Notice of Breach and Cease and Desist**. These notices demanded that Defendant immediately cease using Plaintiff's intellectual property and rectify the violations. Despite multiple attempts to communicate and resolve the matter, Defendant refused to respond or comply with Plaintiff's requests.

**13. Harm Caused to Plaintiff:**

Defendant's willful infringement and failure to resolve the issue has caused substantial harm to Plaintiff, including financial loss, damage to reputation, and ongoing harm to Plaintiff's business interests.

## **STATEMENT OF CLAIM**

**1. Plaintiff's Ownership of Intellectual Property.**

**2. Defendant's Unauthorized Use of Plaintiff's Trade Names:**

Defendant, **PINERIDGE APARTMENTS LLC**, unlawfully used Plaintiff's trade names without written consent in a debt note, drafted on commercial paper. This use was unauthorized and in violation of Plaintiff's copyright and security agreement, which govern the usage of the trade names in any commercial documents.

**3. Violation of Security Agreement:**

Defendant's actions, including the unauthorized securitization of the debt note bearing Plaintiff's trade names, directly violate the security agreement between the parties, which restricts any securitization of commercial documents bearing Plaintiff's intellectual property without written permission.

**4. Failure to Respond and Remedy:**

Despite multiple communications from Plaintiff, including a **Notice of Breach and Cease and Desist**, Defendant failed to respond or remedy the situation, continuing its unlawful actions.

**5. Harm to Plaintiff:**

As a result of Defendant's actions, Plaintiff has suffered financial harm, loss of reputation, and ongoing damage to its business interests.

**FIRST CAUSE OF ACTION**

(Securities Fraud - USC 460)

Defendant's unauthorized securitization of Plaintiff's

commercial instruments constitutes securities fraud through:

1. a. Unauthorized conversion of instruments

b. Undisclosed securitization

c. Profit from unauthorized securities

d. Deliberate concealment of activities

## SECOND CAUSE OF ACTION

(Copyright Infringement)

Defendant's unauthorized use of protected names in

securities transactions constitutes willful copyright infringement,

causing monetary damages through:

- a. Unauthorized commercial use
- b. Profit from protected intellectual property
- c. Continued infringement after notice

#### THIRD CAUSE OF ACTION

(Racketeer Influenced and Corrupt

Organizations Act - 18 USC § 1962)

Defendant's pattern of:

- a. Systematic conversion of instruments
- b. Operation of securitization enterprise
- c. Multiple instances of securities fraud

d. Deliberate avoidance of legal notices

constitutes a pattern of racketeering activity.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that the Court:

1. Grant immediate **injunctive relief**, requiring Defendant to cease all further use of Plaintiff's trade names and securitization of Plaintiff's commercial documents.
2. Award Plaintiff **damages of \$2,500.00 per day** for each day of ongoing violation.
3. Award **statutory damages** for willful copyright infringement under federal law.
4. Require Defendant to **recover all unauthorized securities** transferred or created from Plaintiff's property.
5. Award **costs of suit** and reasonable attorney's fees.
6. Grant such other relief as the Court deems proper for distress and injury in law and equity.

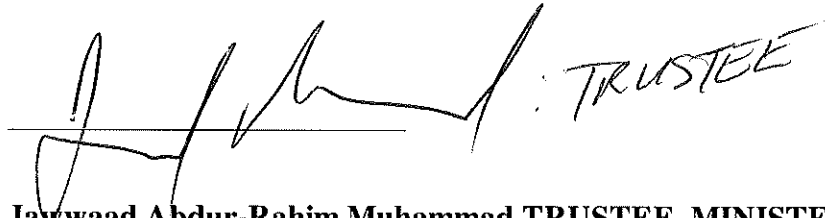
### **DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury on all issues so triable.



**Dated:** January 21, 2025

**Respectfully submitted,**

A handwritten signature in black ink, appearing to read 'Jawwad', is written over a horizontal line. To the right of the signature, the word 'TRUSTEE' is written in a cursive, handwritten style.

**Jawwad Abdur-Rahim Muhammad TRUSTEE, MINISTER**

**JAWWAAD ABDUR-RAHIM MUHAMMAD**

**MINISTRY TRUST**

115 E. Main St., Suite 1025

Grand Prairie, TX 75050

Tel: 682-500-6584

Email: [elmooksitimmoablesllc@outlook.com](mailto:elmooksitimmoablesllc@outlook.com)

**MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS**  
**FILING ENDORSEMENT**

***This is to Certify that the*** ARTICLES OF ORGANIZATION  
***for***

JAWWAAD ABDUR-RAHIM MUHAMMAD LLC

***ID Number:*** 803316828

***received by electronic transmission on*** December 23, 2024 ***, is hereby endorsed.***

***Filed on*** December 27, 2024, ***by the Administrator.***

***The document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.***



***In testimony whereof, I have hereunto set my hand and affixed the Seal of the Department, in the City of Lansing, this 27th day of December, 2024.***

*Linda Clegg*

***Linda Clegg, Director***  
***Corporations, Securities & Commercial Licensing Bureau***

**Company Name** JAWWAAD ABDUR-RAHIM MUHAMMAD  
MINISRY TRUST  
**Pseudonym** JAWWAAD ABDUR-RAHIM MUHAMMAD  
**City** GRAND PRAIRIE  
**Country** United States of America



**Copyright number**

00092968-1

**Received on**

2025-01-12 11:24:55

**Sole Author**

Yes

**Category**

Business > Commercial documents

**Title**

" Copyright of the name 'JAWWAAD ABDUR-RAHIM MUHAMMAD ' "

**Description**

'JAWWAAD ABDUR-RAHIM MUHAMMAD MINISTRY TRUST' and its variations, including 'JAWWAAD ABDUR-RAHIM MUHAMMAD,' 'JAWWAAD MUHAMMAD,' 'JAWWAAD A MUHAMMAD,' and 'JAWWAAD AR MUHAMMAD,' are protected by common law copyright. Any unauthorized use in commerce is strictly prohibited and constitutes infringement

## U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS

Instructions to a Non-Prisoner *Pro Se* Plaintiff

Your suit Jawwad Muhammad Trustee was filed on 1/21/2025 and has been assigned case number \_\_\_\_\_.

These instructions do not include everything you need to know to pursue your case, but following them may help you avoid common mistakes that can result in delay or other consequences—including dismissal of your case.

1. **Filing Procedures** - The Local Civil Rules include the following requirements:

- After you have filed your complaint, unless you are excused for cause or the presiding judge directs otherwise, you must:
  - register as an Electronic Case Files (ECF) user within 14 days (you may register online via our website at [www.txnd.uscourts.gov](http://www.txnd.uscourts.gov)), and
  - file any pleading, motion, or other paper electronically. (Electronic filing is not permitted in a case assigned to the docket of U.S. District Judge John H. McBryde.)
- You must submit a judge's copy (a paper copy) of any document you file, even if you filed the original electronically.
  - If you electronically file a document, follow the procedures set forth in the ECF Administrative Procedures Manual to provide the judge with the judge's copy.
  - If you file a document on paper and want a file-stamped copy returned to you, submit the original, the judge's copy, and an extra copy to be returned to you, and provide a self-addressed, postage-paid envelope. The clerk cannot make an extra copy for you unless you first pay a fee of 50 cents per page.
- You must type or legibly handwrite your documents on one side of numbered pages. Any exhibit or discovery material attached to the filing must be referred to in the filing. Any exhibit or discovery material not referred to in your filing or not attached to your filing may be returned to you.

2. **Address Change** - You must notify the Court if your address changes, or your case may be dismissed. If you are an ECF user, follow the procedures in the ECF Administrative Procedures Manual to update your address. If you are not an ECF user, promptly file a written change of address notice in your case.

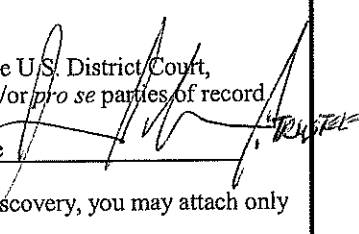
3. **Rules to Follow** - You must read and follow the Federal Rules of Civil Procedure (FRCP), this court's Local Civil Rules, and the orders entered by a judge in your case.

4. **Request for Attorney** - In a civil case, you generally are not entitled to a court-appointed attorney to represent you without cost to you. If you request a court-appointed attorney, a judge will decide whether to appoint an attorney depending on the circumstances of the case. Even if the court decides to appoint an attorney, the attorney cannot be forced to accept the appointment. You may call the Lawyer Referral Service of the State Bar of Texas at (800) 252-9690 for assistance in securing the services of a private attorney to represent you for a fee.

5. **Initial Case Review** - If the Court grants leave to proceed *in forma pauperis*, service of process will be withheld pending review of your complaint, and your complaint may be dismissed pursuant to 28 U.S.C. § 1915(e)(2).

6. **Copies to Defendant** - After a defendant has been served your complaint in compliance with FRCP 4, you must serve a copy of any other document you file upon the defendant's attorney (or upon the defendant, if the defendant is *pro se*) as required by FRCP 5. If you and the opposing side are both ECF users, the ECF system will complete service for you, and a Certificate of Service is not required. If either of you is not an ECF user, or if you learn that service sent through ECF did not reach the person, you must serve the document by other means and include a Certificate of Service or file one within a reasonable time after service. Sample language for a Certificate of Service is:

- On (Date) I filed (the "foregoing document" or Document Name) with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on all counsel and/or *pro se* parties of record by a manner authorized by Federal Rules of Civil Procedure 5 (b)(2).

Signature 

7. **Discovery Materials** - Do not file discovery materials with the clerk. If you file a motion to compel discovery, you may attach only the portions of discovery that are relevant to your motion.

8. **Questions About Your Case** - The court's website at [www.txnd.uscourts.gov](http://www.txnd.uscourts.gov) provides valuable information. Do not write letters to the judge asking questions about your case - all communication with the judge should be through filings. Do not write letters to the clerk asking for instructions on how to handle your case, since the clerk is prohibited from giving legal advice.

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

JAWWAAD ABDUR-RAHIM MUHAMMAD MINISTRY

TRUST Jawwaad Abdur-Rahim Muhammad TRUSTFF

(b) County of Residence of First Listed Plaintiff **TARRANT**

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Jawwaad Abdur-Rahim Muhammad:TRUSTEE 115 E.  
MAIN ST. STE 1025 GRAND PRAIRIE, TEXAS 75050**DEFENDANTS**

PINE RIDGE APARTMENTS LLC, KORCHA REALTY

INVESTMENTS LLC CT CORPORATION SYSTEM

County of Residence of First Listed Defendant **TARRENT**

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

PINERIDGE APARTMENTS LLC 3740 LITTLE ROAD  
ARLINGTON, TEXAS 76016 (817) 429-4095**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question  
(U.S. Government Not a Party)
- ☒ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                                   | DEF                                   |
|---|----------------------------|----------------------------|---|---------------------------------------|---------------------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input checked="" type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5            | <input type="checkbox"/> 5            |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6            | <input type="checkbox"/> 6            |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<b>PERSONAL INJURY</b>	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability		<b>INTELLECTUAL PROPERTY RIGHTS</b>	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander		<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability		<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine		<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability		<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<b>LABOR</b>	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 710 Fair Labor Standards Act	<b>SOCIAL SECURITY</b>	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 720 Labor/Management Relations	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise		<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input checked="" type="checkbox"/> 850 Securities/Commodities/Exchange
<b>REAL PROPERTY</b>	<b>CIVIL RIGHTS</b>	<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<b>IMMIGRATION</b>	<b>FEDERAL TAX SUITS</b>	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment			<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other			<input type="checkbox"/> 950 Constitutionality of State Statutes
	<input type="checkbox"/> 448 Education			
	<b>PRISONER PETITIONS</b>			
	<input type="checkbox"/> 463 Alien Detainee			
	<input type="checkbox"/> 510 Motions to Vacate Sentence			
	<input type="checkbox"/> 530 General			
	<input type="checkbox"/> 535 Death Penalty			
	<b>Other:</b>			
	<input type="checkbox"/> 540 Mandamus & Other			
	<input type="checkbox"/> 550 Civil Rights			
	<input type="checkbox"/> 555 Prison Condition			
	<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

850 Securities Fraud

Brief description of cause:

Securities Violation, Unauthorized Use of Commercial Paper, BREACH OF TRUST PROPERTY. SECURITY Agreement violation.

**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

6500.00

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

JANUARY 21, 2025

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE